

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

---

60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792.0046 • E: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

October 13, 2023

**VIA ECF**

The Honorable Taryn A. Merkl, U.S.M.J.  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Hernandez v. Happy Street LLC et al*  
**Case No.: 1:22-cv-06918-DG-TAM**

Dear Honorable Magistrate Judge Merkl:

This law firm represents plaintiff Aaron Hernandez (the “Plaintiff”) in the above-referenced matter.

Pursuant to the directives in Your Honor’s Orders dated September 1, 2023 and October 11, 2023, this letter respectfully serves to provide the Court with a status update, and to respond to the October 10, 2023 letter motion [Dckt. No. 29] filed by individual Defendant Slobodan Radivojevic (a/k/a Bob Radivojevic) (the “Individual Defendant”).

Plaintiff consents to the Individual Defendant’s request for a *nunc pro tunc* extension of time to file an answer to Plaintiff’s November 13, 202 Complaint [Dckt. No. 1], to, through and including, October 20, 2023.

Plaintiff further respectfully requests that the Court schedule an initial case conference, at a date and time set by the Court.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
Jason Mizrahi, Esq.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, New York 10165  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Plaintiff*

VIA ECF: All Counsel